

of the documents subpoenaed from the City, however, prior to providing their expert reports.

The parties are working together to complete discovery in a timely manner. In the March 2, 2007 joint status report, the parties informed the Court that they expected to need an additional 60-120 days beyond the dates set forth in the Court's September 14, 2006 Order (Doc. 53) to complete discovery and prepare for trial. At this point, the parties request to report back to the Court on June 15, 2007, at which time it is anticipated that the City of Cincinnati will have completed the production of all requested documents. At such time, the parties will be able to jointly report to the Court with proposed dates for the production of expert reports, completion of discovery, dispositive motion deadlines, and the trial schedule.

Respectfully submitted,

s/ Peter J. Stackpole (by Barbara Bison
Jacobson per Authorization)

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF which will send notification of such filing to Peter J. Stackpole, Esq., City of Cincinnati Solicitor's Office, 801 Plum Street, Room 214, Cincinnati, OH 45202; and Kimberly A. Rutowski, Esq., Hardin Lefton Lazarus & Marks LLC, 30 Garfield Place, Suite 915, Cincinnati, OH 45202.

s/ Barbara Bison Jacobson

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